

John L. Cooper, SBN 050324
James W. Morando, SBN 087896
Jeffrey M. Fisher, SBN 155284
Stephanie Powers Skaff, SBN 183119
Farella Braun & Martel LLP
Russ Building, 30th Floor
235 Montgomery Street
San Francisco, CA 94104
Telephone: (415) 954-4400
Facsimile: (415) 954-4480

Joseph R. Tiffany II, State Bar No. 67821
Nicole T. Bartow, State Bar No. 189655
Dianne L. Sweeney, State Bar No. 187198
PILLSBURY WINTHROP SHAW
PITTMAN LLP
2475 Hanover Street
Palo Alto, California 94304-1114
Telephone: (650) 233-4500
Facsimile: (650) 233-4545

Attorneys for Defendant
Secure Data in Motion, Inc. d/b/a Sigaba

Attorneys for Plaintiff and Counterdefendant
PostX Corporation and Counterdefendants
Mayfield Entities

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

POSTX CORPORATION,
Plaintiff,

vs.

SECURE DATA IN MOTION, INC. d/b/a
SIGABA,
Defendant.

Case Nos. C02-04483 SI and C03-0521

STIPULATION RE UNSEALING PORTIONS
OF THE RECORD; [PROPOSED] ORDER

Date: n/a
Time: n/a
Dept: Courtroom 10, 19th Floor
Judge: Hon. Susan Illston

AND RELATED COUNTERCLAIMS.

Plaintiff and Counter-Defendant PostX Corporation ("PostX") and Counter-Defendants Mayfield Principals Fund II, Mayfield XI Qualified, Mayfield XI, Mayfield IX, L.P., Mayfield Associates Fund VI, Mayfield Associates Fund IV, L.P. (the "Mayfield Entities") and Defendant and Counter-Claimant Secure Data in Motion, Inc. d/b/a Sigaba ("Sigaba") hereby stipulate as follows:

WHEREAS, pursuant to a Protective Order entered by this Court, the parties filed several documents under seal with this Court in these actions; and

WHEREAS, appeal Nos. 2006-1565 and 2006-1566 are now pending before the Federal Circuit Court of Appeals arising from these actions; and

WHEREAS, pursuant to Rule 11 of the Federal Rules Appellate of Procedure, the clerk of

STIPULATION RE UNSEALING PORTIONS
OF THE RECORD C02-04483 SI, C03-0521

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1 this Court must forward the trial court record in these actions to the Federal Circuit Court of
2 Appeals; and

3 WHEREAS, pursuant to Federal Circuit Rule 11(d), the parties have reviewed selected
4 sealed portions of the record to determine whether those materials need to remain protected on
5 appeal. A list of the materials reviewed by the parties is attached hereto as Exhibit A; and

6 WHEREAS, PostX and the Mayfield Entities have no objection to the unsealing of the
7 documents produced by PostX, the Mayfield Entities and non-party Alloy Ventures listed on
8 Exhibit A, and Sigaba has no objection to the unsealing of the balance of the materials listed on
9 Exhibit A;

10 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
11 attorneys of record that, subject to approval by the Court, the materials listed on Exhibit A and
12 previously filed under seal with this Court do not need to remain protected on appeal and are to
13 be unsealed.

14 DATED: February 5, 2007

FARELLA BRAUN & MARTEL LLP

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16 By: /s/ Jeffrey M. Fisher
Jeffrey M. Fisher, Esq.

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18 Attorneys for Defendant
Secure Data in Motion, Inc. d/b/a Sigaba

19 DATED: February 5, 2007

PILLSBURY WINTHROP SHAW
PITTMAN LLP

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22 By: /s/ Nicole Townsend Bartow
Nicole Townsend Bartow, Esq.

23 Attorneys for Plaintiff and Counterdefendant
24 PostX Corporation and Counterdefendants
Mayfield Entities

1 I hereby attest that I have on file the holograph signature of Nicole Townsend Bartow,
2 indicated above as a conformed signature.

3 DATED: February 5, 2007


FARELLA BRAUN & MARTEL LLP

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5 By: /s/ Jeffrey M. Fisher
6 Jeffrey M. Fisher, Esq.

7 Attorneys for Defendant
8 Secure Data in Motion, Inc. d/b/a Sigaba

9 PURSUANT TO STIPULATION IT IS SO ORDERED:

10 Dated: _____

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12 _____
13 THE HONORABLE SUSAN ILLSTON
14 Judge of the United States District Court
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